

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

|                          |   |                              |
|--------------------------|---|------------------------------|
| In re:                   | ) | Chapter 7                    |
|                          | ) | Bankruptcy No. 18-13383      |
| JACK CARLTON CRAMER JR., | ) |                              |
|                          | ) | EX PARTE MOTION FOR AN ORDER |
| Debtor(s).               | ) | APPROVING EMPLOYMENT OF      |
|                          | ) | ACCOUNTANT                   |

COMES NOW the trustee, Edmund J. Wood, through counsel, The Livesey Law Firm, and  
Rory C. Livesey, and respectfully represents as follows:

1. The trustee is duly appointed in the above referenced matter and is acting as such.
2. The trustee wishes to employ, pursuant to 11 U.S.C. § 327, the services of Richard N. Ginnis, CPA, to prepare tax returns and provide general accounting services for the estate. Your applicant has chosen the named accountants for the reason that they are an experienced certified public accountant firm and competent to perform the services requested.
3. The accountants have no conflict of interest with the estate under the definitions of 11 U.S.C.
4. The trustee is aware of no connections between the accountant and the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, and any person employed in the office of the United States Trustee other than as set forth in the accountant's declaration.
5. The terms of employment are that the accounting firm shall provide the necessary services at their standard hourly rate and will be paid after an application has been filed herein and an order allowing their compensation has been entered. No retainer has been paid or promised.

**EX PARTE MOTION FOR AN  
ORDER APPROVING EMPLOYMENT  
OF ACCOUNTANT**  
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THE LIVESLEY LAW FIRM  
600 Stewart Street, Suite 1908  
Seattle, WA 98101  
(206) 441-0826

1 No notice to creditors of this motion is necessary pursuant to 11 U.S.C. § 102(1) and  
2 Bankruptcy Rule 2002.

3 WHEREFORE, the trustee prays that the court approve the employment of the accounting  
4 firm as stated above to perform the professional services stated.

5 RESPECTFULLY SUBMITTED this 2<sup>nd</sup> day of August, 2019.

6 THE LIVESEY LAW FIRM

7  
8 */S/ Rory C. Livesey*

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Rory C. Livesey, WSBA #17601  
Attorney for Trustee

10 The undersigned declares under the penalty of perjury that she provided the U. S. Trustee  
11 Office with a copy of this motion, declaration of no adverse interest and proposed order, and at least  
12 seven days have passed since the application was served upon and received by the U.S. Trustee and  
no objection has been made, or the undersigned has been contacted by the U.S. Trustee's Office and  
informed of its approval.

13 DATED this 6<sup>th</sup> day of August, 2019.

14  
15 */S/ Patricia K. Johnson*

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Patricia K. Johnson